

1 HEATHER E. WILLIAMS, SBN #122664
2 Federal Defender
3 HANNAH LABAREE, # 294338
4 Assistant Federal Defender
5 801 I Street, 3rd Floor
6 Sacramento, CA 95814
7 Tel: 916-498-5700/Fax 916-498-5710
8 Attorneys for Defendant
9 ROBERT ALLEN POOLEY

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12 IN THE UNITED STATES DISTRICT COURT
13 FOR THE EASTERN DISTRICT OF CALIFORNIA

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15 UNITED STATES OF AMERICA,) Case No. 2:21-cr-00111-WBS-1
16 Plaintiff,)
17 vs.) STIPULATION AND PROPOSED ORDER TO
18) CONTINUE STATUS CONFERENCE, AND TO
19) EXCLUDE TIME
20 ROBERT ALLEN POOLEY) Date: July 25, 2022
21 Defendant.) Time: 9:00 a.m.
22) Judge: Hon. William B. Shubb
23 _____)

24 IT IS HEREBY STIPULATED by and between the parties hereto through their
25 respective counsel, Acting United States Attorney Phillip Talbert, through Assistant United
26 States Attorneys Christopher Stanton Hales and Katherine Theresa Lydon, attorneys for Plaintiff,
27 and Federal Defender Heather Williams, through Assistant Federal Defender Hannah Labaree,
28 attorney for defendant Robert Allen Pooley, that the previously-scheduled status conference date
of July 25, 2022, be vacated and the matter be set for status conference on October 3, 2022 at
9:00 a.m, at the defendants' request.

To date, the government has produced over 19,000 individual Bates-stamped items, with
additional discovery amounting to over 6 terabytes of data available for further production and
inspection. Counsel for the defendant requires time to review discovery, conduct independent
investigation, and meet with their client to review the material.

For all these reasons, Defense counsel believe that the failure to grant the above-requested continuance would deny them the reasonable time necessary for effective preparation, taking into account the exercise of due diligence.

Based upon the foregoing, the parties agree time under the Speedy Trial Act should be excluded from this order's date through and including October 3, 2022, pursuant to 18 U.S.C. §3161 (h)(7)(A)and (B)(iv) (reasonable time to prepare), and General Order 479, Local Code T4, based upon continuity of counsel and defense preparation.

Counsel and the defendant also agree that the ends of justice served by the Court granting this continuance outweigh the best interests of the public and the defendant in a speedy trial.

Respectfully submitted,

Dated: July 20, 2022

HEATHER E. WILLIAMS
Federal Defender

/s/ Hannah Labaree

HANNAH LABAREE
Assistant Federal Defender
Attorney for Defendant
ROBERT ALLEN POOLEY

Dated: July 20, 2022

PHILLIP A. TALBERT
United States Attorney

/s/Christopher Stanton Hales
CHRISTOPHER STANTON HALES
Assistant U.S. Attorney
Attorney for Plaintiff

/s/*Katherine Theresa Lydon*
KATHERINE THERESA LYDON
Assistant U.S. Attorney
Attorney for Plaintiff

ORDER

IT IS HEREBY ORDERED, the Court, having received, read, and considered the parties' stipulation, and good cause appearing therefore, adopts the parties' stipulation in its entirety as its Order. The Court specifically finds the failure to grant a continuance in this case would deny counsel reasonable time necessary for effective preparation, taking into account the exercise of due diligence. The Court finds the ends of justice are served by granting the requested continuance and outweigh the best interests of the public and defendant in a speedy trial.

The Court orders the time from the date of this order, up to and including October 3, 2022, shall be excluded from computation of time within which the trial of this case must be commenced under the Speedy Trial Act, pursuant to 18 U.S.C. § 3161(h)(7)(A) and(B)(iv) [reasonable time for counsel to prepare] and General Order 479, (Local Code T4). It is further ordered the July 25, 2022 status conference shall be continued until October 3, 2022, at 9:00 a.m.

Dated: July _____, 2022

Hon. William B. Shubb
United States District Judge